

**MCCAW CELLULAR COMMUNICATIONS, INC.**

**Interest:** Provider of cellular telephone service.

**Equal access:**

**Equal access for other CMRS providers:**

- If cellular providers are required to provide equal access, then all competing CMRS providers must be required to provide equal access, in order to ensure regulatory parity. (26-30)
- Cellular digital packet data services (CDPD) should be exempt from equal access obligations. (36-37)

**Implementation:**

- A uniform 18 - 24 month phase-in period should be required of all CMRS providers, regardless of customer base. (30-31)
- Balloting and presubscription rules, perhaps modeled on the McCaw/ATT consent decree, should be promulgated. (31-32)
- If CMRS providers offer their customer list to their affiliated IXC, then they should be required to offer the list to the unaffiliated IXCs on the same terms. (33)
- Because 60% of cellular customers utilize LATA-bound carriers, LATAs should be used to define local calling areas. However, whatever area is chosen should be applied uniformly to all CMRS providers. (33-35)
- Equal access is technologically feasible for interexchange calls initiated by subscribers within their home systems, for calls forwarded by the home system to roaming subscribers, and for calls initiated by roamers in a system using IS-41 signalling protocols. (35-36)
- Should require "1+" equal access to presubscribed IXC in addition to requiring 10XXX access to other IXCs. (37)

- CMRS providers should be allowed to recover the cost of providing equal access from IXC's. (38)
- CMRS providers should be allowed to offer equal access through LEC tandems. However, if one IXC is offered direct access to the cellular MTSOs, all IXC's should be offered such access. (38-39)
- Rules should be promulgated which permit vertically integrated CMRS providers to jointly market cellular, interexchange and other services while preventing discrimination against unaffiliated mobile carriers. (39-40)
- Mobile providers should be required to provide IXC's with whatever information is required to enable the IXC's to properly bill calls. (40-41)

**LEC/CMRS interconnection:**

- Opposes tariffing because the present system of negotiated interconnection is more flexible. (23)
- Opposes filing of contracts with the FCC because this would publicize confidential network data. The combination of "most favored nation" clauses and the FCC complaint process should ensure non-discrimination. (23-24)
- The principles of mutual compensation and good faith negotiation should be applied to intrastate as well as interstate LEC/CMRS agreements. (25)

**CMRS/CMRS interconnection:**

- Against mandatory interconnection because:
  - LECs already provide a form of interconnection and there is enough competition in the CMRS market to force providers to interconnect when there is sufficient customer demand. (6-9)
  - Mandated interconnection would force providers to interconnect when it is neither technically nor economically practical to do so. (9-14)
  - If a CMRS provider is truly unreasonable in refusing to interconnect, the aggrieved party

can seek relief under section 208 or the antitrust laws. (17-18)

- Opposes any resale/interconnection obligation which will cause the "unbundling" of CMRS networks (i.e. the obligation to provide switch-based resale or resale of only the radio portion of the network) because such obligations would be technically impractical for switch-based resale, inefficient for radio only resale, and redundant in light of existing "bundled" resale obligations. (14-17)
- In order to promote the development of a seamless national wireless infrastructure, the FCC should preempt any state regulation of CMRS interconnection. (18-20)

**CMRS resale obligations:**

- To ensure regulatory parity, any resale obligations should be imposed uniformly on all CMRS providers. (21)
- In order to encourage the development of CMRS infrastructure, CMRS providers should not be required to resell to facilities-based competitors within the same service area. (21-22)

**MCI TELECOMMUNICATIONS CORP.**

**Interest:** Interexchange carrier.

**Equal access:**

**Cellular equal access:**

- Favors equal access so that cellular customers can have access to packages such as MCI Vnet, which allows businesses to customize each cellular user's calling plan, thereby saving corporate customers both connection and administrative costs. (2-3)

**Equal access for other CMRS providers:**

- Favors equal access whenever it is technologically feasible, regardless of the cost, for all similarly situated, competitive CMRS providers. (3)

**Implementation:**

- Favors using existing LATAs as equal access boundaries for CMRS because:
  - The infrastructure is in place to provide inter-LATA equal access and customers are already familiar with LATAs. (4)
  - The current broad regional calling areas penalize customers who make mostly intra-LATA calls. (4-5)
  - Because the PCS of the future will function exactly like a cordless home or business phone, and most calls made from the home or business are intra-LATA calls, the LATA is well suited for administering future CMRS services. (5-6)
- Would only grant equal access waivers for CMRS technologies for which it is technologically impossible to provide equal access. (6-7)
- Because wireless services will eventually be fully competitive with landline services in terms of cost and service, favors applying the

exact same equal access requirements to CMRS as are applied to LECs. (7-8)

- Favors "1+" presubscription rather than 800 or 950 equal access. (8)
- Favors a nondiscriminatory system of balloting of customers for their IXC of choice. (8-9)
- Favors proportional allocation of customers who fail to choose an IXC. (9)
- Because BOCs have been able to convert non-equal access CMRS services to equal access services within 12 months, other CMRS providers should face an equally short deadline. (10)
- In order to allow IXCs to properly bill for long distance cellular calls and to help prevent fraud, CMRS providers should provide IXCs with customer billing information. (10-11)

**LEC/CMRS interconnection:**

- Favors tariffing so as to prevent unlawful discrimination, which is especially important given that the FCC has proposed allowing LECs to remain joined to their CMRS affiliates. (11-12)
- LECs should be required to provide any appropriate form of CMRS interconnection upon request. (12)
- Cellular carriers are to be treated as local exchange co-carriers and as such are to be entitled to mutual compensation. (12)

**CMRS/CMRS interconnection:**

- As common carriers, CMRS providers should be required to provide interconnection to other CMRS providers upon reasonable request. (12)
- There should be no unreasonable restriction imposed on the resale of CMRS. (13)

**MARITEL**

**Interest:** Provider of public coast station services.

**Equal Access:**

**Equal access for other CMRS providers:**

- There is not the same type of market dominance among the broad range of CMRS providers as was held by pre-divestiture AT&T. (2)
- Many CMRS providers are struggling small businesses. The costs of complying with equal access requirements may outweigh the benefits to consumers. (3)
- Public coast stations have experienced intense competition from cellular providers. In light of their weakened position, public coast stations should not be subject to equal access obligations. (4)
- If Maritel is required to comply with equal access obligations, its customers will bear the burden. The Commission should only impose equal access obligation on CMRS providers with sufficient market power to ensure that the obligations benefit the consumer. (4)
- The Commission should adopt objective guidelines to determine when equal access obligations should be imposed. Obligations should be imposed when a CMRS provider engages in diversification or cross-ownership with a LEC or long distance carrier, or when a LEC or long distance carrier owns a controlling share in a CMRS company. (5)

**Implementation:**

- Opposes the adoption of any service area definitions/boundaries for purposes of limiting service coverage and capabilities by CMRS providers. It is impossible for Maritel to determine the location from where a call is initiated. (6)
- Requiring Maritel and other CMRS providers to hand-off a call every time it crosses a LATA boundary would pose technical difficulties

that would require a complete re-design of existing systems. The costs of re-designing would put Maritel out of business.

- As technology develops and CMRS operators develop broader wireless coverage, it would be counterproductive to require customers to engage a landline long distance carrier simply because a call has crossed an arbitrary line.  
(7)

**MISCELLCO COMMUNICATIONS, INC.**

**Interest:** Cellular service provider.

**Equal access:**

**Cellular equal access:**

- There is no historical or public policy basis to impose equal access obligations upon cellular providers. (3)
- Smaller non-BOC cellular operators, such as Miscellco, do not have the financial resources or the market power to warrant imposition of equal access. (3-4)
- The costs to provide equal access are prohibitive and outweigh any benefits. Miscellco would not be able to implement equal access and continue to operate a viable cellular system. (5)
- The regulatory burdens of equal access will hinder the growth of the cellular industry by discouraging investment, creating disincentives for improvement, and hampering cellular operators' ability to compete against other wireless service providers to meet end-to-end communications needs of the mobile users. (7-8)
- The Commission does not provide adequate evidence that consumers desire equal access. The ultimate effect of equal access will be increased costs to consumers and enrichment of large IXC's. (8)



**NATIONAL ASSOCIATION OF RADIO UTILITY COMMISSIONERS (NARUC)**

**Interest:** Organization of state regulatory authorities.

**Equal Access:**

**Cellular equal access:**

- For reasons enumerated in earlier proceedings, NARUC favors equal access. (2)

**LEC/CMRS interconnection:**

- If LEC/CMRS interconnection is not tariffed or otherwise regulated by the FCC, the states should remain free to regulate in this area. (3)

**CMRS/CMRS interconnection:**

- If CMRS/CMRS interconnection is not regulated by the FCC, the states should remain free to do so. (3)

**NATIONAL ASSOCIATION OF  
BUSINESS AND EDUCATIONAL RADIO, INC. (NABER)**

**Interest:** Trade association representing members of the mobile communications industry. NABER is also a recognized frequency coordinator for the Business Radio Service and the FCC.

**Equal Access:**

**Cellular equal access:**

- Believes the focus of the FCC in this proceeding should be on broadband CMRS services. (3)

**Equal access for other CMRS providers:**

- Agrees with FCC's initial determination that equal access requirements should not apply to paging and other forms of narrowband CMRS, as such requirements are unnecessary. (3)
- Believes equal access requirements should not be imposed on two-way services, such as traditional SMR systems, 220 MHz Systems, and 450-512 MHz two-way systems on Business Radio channels, or on any wide-area SMR system, for the following reasons: (3-4)
  - The traditional SMR operator provides dispatch service with a small amount of interconnect traffic and has little ability to control the offerings and obligations of LECs which provide connections to the SMR system. (4)
  - Because SMR operators do not control "bottleneck" facilities, the rationale for imposing equal access requirements on BOCs does not apply to SMR systems. (6)
  - Equal access may create such substantial costs for small carriers that competition may actually be reduced. (6)

- Equal access is not typically a concern for SMR system end users. (7)
- Equal access requirements may actually increase costs for end users because SMR operators will no longer negotiate rates more favorable than those typically available to individual users. (7)
- The installation of dedicated lines and the purchase of other new equipment would create substantial costs for SMR operators, which would be passed on to end users. (7-8)
- Competition between wide-area SMR systems and cellular providers does not exist at present and may not exist in the future. (8-9)

**Implementation:**

- Supports FCC's suggestion that equal access requirements be tailored to meet the individual circumstances of particular CMRS providers. (5)

**Other:**

- Agrees with the FCC that an analysis of market power is relevant to consideration of whether equal access serves policy goals of the FCC. (6)

**CMRS/CMRS Interconnection:**

- Opposes mandatory interconnection between CMRS providers because such a requirement is unnecessary to ensure access to the public switched network. Further, requiring interconnection between incompatible platforms would require a massive investment in new equipment for many SMR operators, and even requiring interconnection between operators in the same markets with the same platforms would be technically complex. Interconnection between certain wide-area SMR systems is not possible. Finally, few customers of traditional SMR systems have the need for

interconnected service beyond the service area of a single operator. (9-11)

- Suggests that the FCC permit marketplace forces to determine whether voluntary agreements for roaming should proliferate among SMR operators with similar platforms. (11)

**CMRS resale obligations:**

- Opposes CMRS carrier resale obligations as applied to SMR systems. Mandatory resale obligations could thwart the efforts of small SMR operators to effectively manage their customer bases. Also, mandatory resale obligations are unnecessary for SMR systems since SMR operators do not have market power, offer limited interconnect services, do not control a bottleneck, and because customers have many alternatives for service. (11-12)

## **NATIONAL CELLULAR RESELLERS ASSOCIATION**

**Interest:** Association of resellers of cellular service.

### **LEC/CMRS interconnection:**

- LECS and CMRS providers should be required to file interconnection tariffs. (18)
- The Communications Act does not permit forbearance from cellular CMRS interconnection tariffs. Moreover, due to the market power of cellular carriers, interconnection tariffs are necessary to protect the parties requesting interconnection. (18-19)
- Tariffing is the most effective way to assure that LEC rates are fair, reasonable and non-discriminatory. The filing of contractual information and the adoption of a most favored nation requirement ignore the statutory obligation to tariff rates. (19)
- The administrative burden of simultaneous negotiations would be great. Moreover, the negotiations might lead to unreasonable delay, or unfair preferences in the timing or terms of interconnection. (20)

### **CMRS/CMRS interconnection:**

- The Commission should take procedural steps to rectify its failure to comply with the statutory deadlines for CMRS interconnection. For example: 1) it can convert the NOI into a NPRM; 2) NCRA's petition for reconsideration of the Second Report and Order can be used for the adoption of specific rules; or 3) the Commission should issue a Public Notice stating that CMRS licensees must, in good faith, negotiate interconnection arrangements even in the absence of specific interconnection rules. (5-7)
- Section 332(c)(1)(B) requires all common carriers to interconnect with CMRS providers. To interpret this section as not requiring CMRS-CMRS interconnection would render the clause meaningless. (9)
- The same factors that led the Commission to conclude that imposition of equal access

obligations on cellular carriers is in the public interest apply to the interconnection obligations of cellular carriers with respect to other CMRS providers: (9)

- Cellular licensees exercise bottleneck control over cellular facilities. This power can be used by cellular licensees to deny network access to CMRS providers, including resellers. (9-11)
- Cellular-to-CMRS interconnection will produce public benefits such as increasing the overall number of CMRS carriers from which customers may choose; lowering consumer prices; accelerating the development of enhanced services; and increasing access to alternative networks. (12-16)
- NCRA supports the following terms and conditions of interconnection: (16-18)
  - All interconnection arrangements that are technically and economically feasible should be considered reasonable;
  - The party requesting interconnection should pay costs directly related to interconnection;
  - The interconnecting party should not be responsible for the costs of increasing network capacity;
  - Parties alleging infeasibility should be required to demonstrate such conditions by a clear preponderance of evidence;
  - Carriers should be required to charge interconnecting parties reasonable, unbundled, cost-based rates.
- If the Commission does not promulgate regulations requiring CMRS-to-CMRS interconnection, the Commission should not, as a matter of law and policy, preempt the states from requiring such interconnection arrangements. (21)

**CMRS resale obligations:**

- The Commission should encourage and require resale across all classes of CMRS services as this is essential to the development of a competitive marketplace. Restricted resale by CMRS providers would undermine the goals of spectrum caps. Unrestricted resale will enable CMRS providers to begin marketing their services immediately by reselling the services of established carriers.  
(19-20)

## **NATIONAL TELEPHONE COOPERATIVE ASSOCIATION**

**Interest:** Association of rural LECs.

**Equal access:**

**Cellular equal access:**

- Mandatory equal access would not serve the public interest. (2)
- The framework from the wireline industry does not apply to the wireless industry. Equal access would disrupt the pricing freedom of the non-Bell cellular operators, thereby unnecessarily confining the development of wireless services to the wireline model. (2)
- Equal access would be burdensome on small wireless service providers. Many of these systems do not experience the volume of long distance traffic from cellular users to justify the costs of equal access. (3)
- Customer benefits of equal access do not outweigh the costs. The cellular service market is competitive and the buying power of the multiple cellular providers fosters competition among IXCs. If equal access-like requirements truly lead to consumer benefits, then cellular customers in mixed markets would be migrating to the equal access carrier. (4-5)

**Equal access for other CMRS providers:**

- See summary of cellular equal access above.

**Implementation:**

- Because various CMRS services have different license areas, no satisfactory common service area can be set for cellular, PCS, SMR and other CMRS services. (3)
- If the Commission does adopt an equal access provision, it should adopt a flexible conversion and phase-in policy: There should be maximum per-unit cost thresholds over which the introduction does not make sense and there should be minimum IXC participation thresholds under which introduction would be meaningless. (6-7)



**NEW PAR**

**Interest:** Nonwireline cellular service provider.

**Equal access:**

**Cellular equal access:**

- New Par is in a unique position because it has provided cellular service in a variety of contexts (i.e., without any equal access obligations, under the MFJ's equal access provision, and voluntarily by offering IXC choice to its subscribers.) (2)
- Mandatory equal access obligations are not warranted. New Par has voluntarily honored its customers' IXC choices due to the dictates of the competitive marketplace. (2-3)
- As competition in mobile services increases, the market will continue to meet customer demands for IXC choice. (3)
- Equal access has been mandated in situations where the local exchange provider has bottleneck control or where the local exchange provider will also have dominant power in the long distance market. Neither is the case in the CMRS market. (4)

**Equal access for other CMRS providers:**

- If the Commission does impose mandatory equal access, it must impose the same requirements on all cellular-like CMRS providers. Disparate treatment of similarly situated providers, including resellers and broadband PCS and ESMR licensees, would be inconsistent with regulatory parity. (6-7)

**Implementation:**

- If the Commission mandates equal access, the equal access obligations should not apply to intersystem handoffs. (7-8)
- No equal access obligation should apply to the provision of service to roamers, or the provision of call forwarding, automatic call delivery, and other enhanced CMRS features.

The marketplace should determine which CMRS providers will provide equal access for these services. (8-9)

- CMRS providers should be given a phase-in implementation period of not less than six months. (9)
- The Commission's proposal for presubscription and balloting will saddle consumers with unnecessary expenses. Providers that have already provided equal access should continue to honor the pre-existing IXC choices made by subscribers. (11)
- The Commission should establish MTAs as the basic equal access CMRS service area as these are the largest available areas and will impose the fewest burdens. (12-13)
- Cellular licensees must be authorized to consolidate adjacent service areas of existing systems even if they go beyond an MTA boundary in order to enable licensees to continue carrying traffic through regions where they currently offer expanded calling services. (13-14)
- The requirement to deliver a call to the subscriber's chosen IXC would apply only when the call terminates in a territory outside the MTA in which the call originated and outside a contiguous area in which the originating carrier is licensed. (14)
- The Commission must grandfather those service areas in which cellular providers were granted waivers of the equal access and interLATA calling restrictions. (15-16)
- The Commission should make clear that CMRS licensees not otherwise excluded from the provision of interexchange services are allowed to furnish integrated cellular and interexchange services. (16)
- CMRS providers should be able to compete for equal access selection on the same basis as other IXCs including the marketing of their long distance services. IXCs should not be entitled to CMRS provider's customer list. (17)

- Carriers should be able to fully recover their equal access costs. The costs can be handled through contracts between IXC's and CMRS providers which contain a most favored nation clause. (19)
- Only the information that is absolutely necessary for IXC's to bill existing subscribers should be released as confidentiality is vital to the CMRS provider's business operations. The information should be used solely for IXC call completion, billing and collection. (19-20)
- To the extent that information is made available to IXC's, CMRS providers should not be required to offer billing and collection services to IXC's. (20)

**LEC/CMRS interconnection:**

- The Commission should clarify that federal policy with respect to CMRS interconnection must preempt inconsistent state regulations. (21)
- Interconnection should be arranged through individually negotiated contracts which contain a most favored nation provision. (21)
- LECS must not charge CMRS providers for services that are not wanted by the interconnecting CMRS provider or are not charged to interconnecting landline LEC's.
- Each CMRS carrier must be able to choose the type and quantity of physical interconnection best suited for its purposes. (22)

**CMRS/CMRS interconnection:**

- It is not necessary to require interconnection between CMRS providers. CMRS carriers have no control over bottleneck interconnection facilities. In cases where it is more efficient for CMRS providers to interconnect directly, the parties will negotiate interconnection agreements. (22-23)
- If the Commission does require CMRS-to-CMRS interconnection, it should preempt state regulation from these matters and provide that all interconnection interfaces must utilize industry standard hardware and protocols. (23)

**NEW YORK STATE DEPARTMENT OF PUBLIC SERVICE**

**Interest:** State regulator.

**Equal access:**

**Equal access for other CMRS providers:**

- Equal access obligations should be imposed on all CMRS providers. Equal access obligations will result in greater choices and lower rates for customers. (2)
- Equal access will provide a level playing field between wireline and nonwireline CMRS providers. (2-3)
- The costs of providing equal access are not significant because most CMRS providers have digital switches that are capable of providing equal access. (3)
- Trunking costs are minimal or nonexistent. Moreover, because trunking would be provided by the interexchange carrier, no additional costs would be incurred by the CMRS providers. (4)
- There is no need for an elaborate presubscription process. Instead, simple notification to consumers should be sufficient. (4)

**LEC/CMRS interconnection:**

- New York state requires LECs to file interconnection tariffs for intrastate services. (4)
- Because cellular service is used primarily to provide local, intrastate telephone service, the current system should not be altered. If interconnection by wireless carriers is used to complete interstate calls, the Commission should require tariff filings in order to avoid discrimination claims. (4-5)

**CMRS/CMRS interconnection:**

- Due to the low volume of CMRS-to-CMRS traffic, connecting through the LEC has been efficient.

However, as the number of CMRS services increases, direct interconnection between CMRS providers may become more desirable. (5-6)

- States should administer CMRS-to-CMRS interconnection arrangements for intrastate traffic. (6)
- CMRS-to-CMRS interconnections should be required only if a party presents a bona fide request and can demonstrate that such interconnection is in the public interest. (6)
- If the Commission does not impose interconnection obligations on CMRS providers, it should not preempt the states from imposing such obligations. The states are best suited to monitor CMRS interconnection. Moreover, the Congress did not intend to prevent the states from regulating interconnection among CMRS providers. (6-7)

**NEXTEL COMMUNICATIONS, INC.**

**Interest:** Largest provider of ESMR and SMR services in the United States.

**Equal access:**

**Equal access for other CMRS providers:**

- The Commission should not impose equal access obligations on CMRS providers. (5)
- Equal access obligations imposed on the LECs made sense, because of the LECs bottleneck. However, there is increasing competition in the wireless market. Therefore, equal access obligations are unnecessary. (5-6)
- Market forces will compel CMRS providers to provide consumers access to the providers they prefer. (6-7)
- Equal access requirements are unnecessary and would create higher costs for CMRS providers and higher prices for consumers. (6-7)
- Unlike current cellular providers, CMRS providers lack market power. Therefore, equal access requirements are unnecessary as CMRS providers are not in a position to dictate consumer decisions. (8-9)
- Imposing costly equal access obligations will delay the development of a robust CMRS marketplace. (9)
- The costs of mandated equal access for CMRS providers outweigh the benefits. (10)
- Consumers are more concerned with obtaining the lowest price for service than with having access to a particular carrier. CMRS providers are able to obtain bulk discounts from IXC's that lower the cost of service. (10)
- Equal access obligations would require Nextel to change its existing switches at great cost and substantial delay. However, if such mandates are imposed,

they should not take effect until August 10, 1996. (11-12)

- Equal access obligations would also lead to continuing costs for operating and administering an equal access program. (12)
- If equal access requirements are imposed, they should be phased in over time, particularly for systems classified as private land mobile radio. This will permit the expeditious deployment of ESMR services. (12-13)
- CMRS providers are not yet capable of providing equal access. If imposed, equal access mandates should be phased in after August, 10 1996, the date at which certain CMRS providers will cease to be classified as private carriers. (13)
- At a minimum, the Commission should refrain from imposing presubscription and balloting on CMRS providers. (14)

**LEC/CMRS interconnection:**

- Whether by tariff or contract, the Commission should ensure that CMRS providers can obtain nondiscriminatory interconnection with LECs at just and reasonable rates. (14-15)
- There should be a uniform approach to interconnection so that CMRS providers are not subject to different regulatory approaches in each state. (15)
- Nextel favors requiring interconnection tariffs. However, if contracts are used they should contain "most favored nation" clauses. (16-17)
- Supports the principle of mutual compensation and believes that the Commission must ensure that CMRS providers receive compensation for landline traffic terminating on the CMRS system. (17-18)

**CMRS/CMRS interconnection:**

- Due to the infancy of the CMRS industry, the Commission should not mandate CMRS/CMRS interconnection. (18)

- CMRS/CMRS interconnection is unnecessary because all CMRS end-users can interconnect through the public switched telephone network. (18-19)

**CMRS resale obligations:**

- Unlike at the inception of the cellular industry, there are several CMRS providers and therefore resale requirements are unnecessary. In addition, resale obligations would create a disincentive for CMRS providers to build out their systems. (19-20)



### THE NYNEX COMPANIES

**Interest:** Regional Bell Operating Company.

**Equal Access:**

- Believes that equal access obligations should be imposed on all CMRS providers only so long as the MFJ's equal access requirements remain effective for the following reasons:
  - Experience to date demonstrates that the imposition of equal access obligations on RHCs has not resulted in lower long-distance rates for cellular customers. The only means by which customers have benefited from reduced prices have been vertical integration or bundling of services. (3-5)
  - Because RHC cellular companies cannot buy long-distance service in bulk and resell that service to their customers, non-RHC cellular companies face little competitive pressure to pass along bulk-rate savings to their customers. (5)
  - The competitiveness of the marketplace will guarantee consumer choice. (5)
  - Although equal access will not result in lower prices and increased customer choice, equal access obligations will achieve regulatory parity and correct the competitive imbalance created by the equal access provisions of the MFJ. (6-7)
- Urges the FCC to support efforts presently being undertaken to modify the MFJ so as to remove equal access obligations in connection with the provision of wireless services. (3, 7)

**Implementation:**

- Agrees with the FCC's proposal that the timetable for equal access should be established separately for each type of CMRS service. (8)
- Believes the FCC should define the wireless exchange area for all CMRS providers as coterminous with LATA boundaries. (8)